



Advocates for Workplace Fairness

September 2, 2021

Via ECF

The Honorable Roanne L. Mann
United States Magistrate Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Mason v. Lumber Liquidators, Inc.*
No. 17 Civ. 04780 (RLM)

Dear Judge Mann:

Together with Stevenson Marino LLP, we represent Plaintiffs in the above-referenced matter. We write together with counsel for Defendant to provide a status update regarding a proposed notice to the New York Non Opt-ins.

On August 19, 2021, the Parties reported that they had agreed in principle to send notice to the New York Non Opt-ins before submitting a revised settlement agreement to the Court, but they were still discussing the language of that proposed notice. ECF No. 238. The Parties have not yet been able to agree on the terms of the language of the proposed notice.

Accordingly, the Parties respectfully request that they be permitted to submit a proposed notice to the New York Non Opt-ins on October 12, 2021 together with the revised settlement agreement. Should the Parties be able to reach an agreement on the proposed notice before October 12, 2021, they will submit the proposed notice to the Court for approval in advance of filing the revised settlement agreement.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "Justin M. Swartz", written in a cursive, stylized manner.

Justin M. Swartz

cc: Counsel of Record (via ECF)